

**MINISTRY OF FINANCE**  
**(Department of Revenue)**  
(CENTRAL BOARD OF DIRECT TAXES)  
**NOTIFICATION**

New Delhi, the 31st March, 2026

**INCOME-TAX**

**G.S.R. 240(E).**— In exercise of the powers conferred by section 295 read with section 101 of the Income-tax Act, 1961 (43 of 1961), the Central Board of Direct Taxes hereby makes the following rules further to amend the Income-tax Rules, 1962, namely: —

1. (1) These rules may be called the Income-tax (Tenth Amendment) Rules, 2026.  
(2) They shall come into force on the date of their publication in the Official Gazette.
2. In the Income-tax Rules, 1962, in rule 10U, —
  - (a) in sub-rule (1), for clause (d), the following clause shall be substituted, namely: —

“(d) any income accruing or arising to, or deemed to accrue or arise to, or received or deemed to be received by, any person from transfer of such investments which were made before the 1st day of April, 2017 by such person.”;

- (b) for sub-rule (2), the following sub-rule shall be substituted, namely: —

“(2) The provisions of Chapter X-A shall apply to any arrangement, irrespective of the date on which it has been entered into, in respect of the tax benefit obtained from the arrangement on or after the 1st day of April, 2017, except for that income which accrues or arises to, or deemed to accrue or arise to, or is received or deemed to be received, by any person from transfer of such investments which were made before the 1st day of April, 2017 by such person.”.

[Notification No. 54/2026/F. No. 370142/15/2026-TPL]

ROHIT SINGH, Under Sey., TPL-I, CBDT

**Explanatory Memorandum:** The amendment will have the effect that the provisions of Chapter X-A shall not be invoked on or after the date of publication of these rules in the Official Gazette in a case where income accrues or arises to, or deemed to accrue or arise to, or is received or deemed to be received, by any person from transfer of such investments which were made before the 1st day of April, 2017 by such person.

**Note:** The Income-tax Rules, 1962 was published in the Gazette of India, Extraordinary, Part II, section 3, sub-section (ii) *vide* number S.O. 969 (E), dated the 26th March, 1962 and was last amended *vide* notification number G.S.R. 233(E), dated the 30th March, 2026.